

## **Privacy policy (as of September 2020)**

### **1. Foreword**

Regardless of whether you are a customer, prospective customer, applicant or visitor to our website: We, STEVEN Reeds GmbH ("STEVEN", "we") take the protection of your personal data very seriously. But what does this mean in concrete terms?

In the following, we will give you the opportunity to gain an insight into what personal data we collect from you and how we process it. In addition, you will receive an overview of the rights to which you are entitled under the applicable data protection law. We will also provide you with the names of your contact persons in case you have any further questions.

The content of this note may change over time. We therefore recommend that you check this page regularly.

#### **1.1 Who are we?**

Founded in 1844, STEVEN has been your contact for individual solutions in reeds and warp preparation for more than 150 years.

Since 2017 Steven has been part of the Groz-Beckert Group. Groz-Beckert is the world's leading supplier of industrial machine needles, precision parts and fine tools as well as systems and services for the production and joining of textile surfaces.

Steven weaving reeds are used worldwide in the most demanding applications.

As the responsible party in terms of the applicable data protection laws, we

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Brookstraße 27  
48607 Ochtrup  
Germany

Phone: +49 2553 93750  
Fax: +49 2553 2913  
info@steven.de

take all measures required under the applicable data protection law to ensure the protection of your personal data.

If you have any questions regarding this privacy policy, please contact our data protection officer.

STEVEN Reeds GmbH Data Protection Officer  
c/o Groz-Beckert KG  
Parkweg 2  
72458 Albstadt  
Germany  
data.protection@groz-beckert.com

### **2. Scope of application of the privacy policy**

By processing of personal data, the legislator understands activities such as the collection, recording, organization, managing, filing, storage, adaptation or modification, reading, consultation, use, disclosure by transmission, dissemination or any other form of provision, comparison or interconnection, restriction, deletion or destruction of personal data.

Personal data is any information relating to an identified or identifiable natural person.

This privacy policy deals with the personal data of customers, interested parties, applicants or visitors.

This privacy policy applies to our website [www.steven.de](http://www.steven.de) as well as to information provided to us in writing.

The website [www.steven.de](http://www.steven.de) contains links to third-party websites (e.g. Google Maps). Separate privacy policies apply when using third-party websites.

### **3 Which personal data do we process?**

Your personal data is collected by us when you contact us, e.g. as a prospective customer or customer. This can happen, for example, when you are interested in our products, contact us via our communication channels, or use our products or services within the framework of existing business relationships.

The following types of personal data are processed by us:

- Personal identification information
  - e.g. first and last name, address data, e-mail address, telephone number, fax number
- Order data
  - e.g. customer number, order number, invoice data
- Company-related data
  - e.g. company name, department, activity, machinery
- Information about your interests and wishes, which you communicate to us
  - e.g. via our communication channels
- Information about your professional career
  - e.g. vocational training, previous employers, other qualifications

and other information comparable to these data categories.

#### **3.1 Sensitive data**

Sensitive data, i.e. special categories of personal data such as information on religious affiliation or trade union membership, are only collected by us if you provide us with this data.

#### **3.2 Personal data of minors**

Personal data of children or minors are only collected if they use our communication channels.

#### **3.3 Use of cookies**

Our website [www.steven.de](http://www.steven.de) does not use any cookies.

### **4 What do we process your personal data for - and on what legal basis?**

#### **4.1 Fulfillment of contract**

We process your data to be able to fulfill our contracts. This also applies to information that you provide to us in the course of pre-contractual correspondence. The specific purposes of the data processing depend on the product in question and the application made and can also be used to analyze your needs and to check which products and services are suitable for you.

##### **4.1.1 Execution of contractual relationship**

For the execution of the contractual relationship we need your name, your address, your phone number or your e-mail address so that we can contact you.

##### **4.1.2 Offering of goods and services**

We also need your personal data in order to check whether and which products and services we can and may offer you. Details of the respective purposes of data processing can be found in the contract documents and our General Terms and Conditions.

##### **4.1.3 Processing of applications**

We process the data you send us as part of your application to check whether your professional qualifications are suitable for the job in question. We only use your information for the application procedure and transfer it to your personnel file when a contract is concluded. If no agreement is reached, your information will be deleted or destroyed. We will not use your applicant information for any other purpose than for the application process.

## **4.2 After weighing of interests: We improve our services and offer you suitable products**

### **4.2.1 To strengthen and optimize the customer relationship**

As part of our efforts to continuously optimize our relationship with you, we occasionally ask you to participate in our customer surveys. The results of the surveys are used to better tailor our products and services to your needs.

### **4.2.2 Data processing and analysis for marketing purposes**

Your needs are important to us, and we try to provide you with information about products and services that are right for you. To do this, we use the knowledge gained from our common business relationship and from market research. The main goal is to adapt our product proposals to your needs. In this context, we guarantee that we always process the data in accordance with applicable data protection laws. Important: You can object to the use of your personal data for this purpose at any time.

What do we analyze and process in concrete terms?

- Results of our marketing activities to measure the efficiency and relevance of our campaigns;
- Potential demand for our products and services.

### **4.2.3 E-maillings**

After your relevant subscription through our Portals, you can receive e-mails from us with information about interesting trade fairs, news about STEVEN, invitations to customer events, job advertisements, etc., adapted to your needs. You have the right to object to these personalized notifications at any time.

### **4.2.4 Measures taken for your safety**

Among others, we use your personal data in the following cases:

- To be able to guarantee IT security;
- To be able to record and prove facts in case of possible legal disputes.

## **4.3 Based on your consent**

If you have agreed to the processing of your personal data for one or more specific purposes, we are permitted to process your data. You can revoke this consent with a view to the future at any time without incurring any costs other than the transmission costs according to the basic tariffs (costs of your Internet connection). The revocation of consent does not affect the legality of the processing of data prior to the revocation.

## **4.4 Based on statutory provisions or public interest**

As a company, we are subject to a wide variety of legal requirements (e.g. concerning tax legislation). In order to comply with our legal obligations, we process your personal data.

## **5. Where do we transfer your data and why?**

### **5.1 Data use within STEVEN**

Within STEVEN, access to your personal data is only granted to those departments that need it to fulfill our contractual or legal obligations or to protect our legitimate interests.

### **5.2 Data use outside STEVEN**

We respect the protection of your personal data and only pass on information about you if required by law, if you have given your consent, or to fulfill contractual obligations.

For example, the following recipients may be legally obliged to pass on your personal data:

- Public bodies or supervisory authorities, e.g. tax authorities, customs authorities;
- Judicial and law enforcement authorities, e.g. police, courts, prosecution;
- Lawyers or notaries, e.g. in case of lawsuits;
- Auditors.

To fulfill our contractual obligations, we cooperate with other companies. These include:

- Transport service providers and forwarding agents;
- Organizers and training service providers, if you have registered through us for certain trade fairs or events;
- Banks and financial service providers to handle all financial matters.

### **Own service providers**

For an efficient operation, we resort to external service providers like IT service providers, print and telecommunication service providers collection agencies, consulting firms or distribution companies who might also get your personal data for the fulfillment of the described purposes.

### **Important: We keep an eye on your personal data!**

To ensure that the service providers stick to the same data protection standards as we do, we have concluded appropriate contracts for order processing. Among others, these contracts regulate the following items:

- Third parties get access exclusively to the data they need for fulfilling the tasks assigned to them.
- At the service providers, only employees who explicitly undertook to comply with the data protection regulations, will get access to your data.
- The service providers comply with technical and organizational measures which guarantee data security and data protection.
- Handling of the data after termination of the business relation between the service provider and us.

For service providers located outside the European Economic Area (EEA), we take special security measures (e.g. by using special contractual clauses) to ensure that the data is treated with the same level of care as in the EEA. We regularly check all our service providers for compliance with our requirements.

### **Very important: Under no circumstances will we sell your personal data to third parties!**

#### **5.3 Use of data within the Groz-Beckert Group**

To provide you with the best possible service, we occasionally exchange data within the Group. In doing so, we ensure that the applicable data protection regulations are complied with and that your personal data is adequately protected at all times.

For this reason, we have taken appropriate measures to ensure compliance with data protection within the Groz-Beckert Group:

We have concluded appropriate agreements with the individual affiliated companies to ensure that personal data exchanged within the Group is always protected.

In accordance with these contracts and the applicable data protection laws, we transfer personal data to our production and sales affiliates only for the purposes specified in this privacy policy. In doing so, we support our affiliated companies both operationally and in complying with the technical and organizational measures that we also use at the parent company to ensure the security of your personal data. Whenever possible, we protect your data by using pseudonymization or anonymization measures. If affiliated companies are located outside the EEA, we take appropriate measures to ensure that the personal data processed there is protected in the same way as within the EEA.

### **6. Are you obliged to provide us with personal data?**

In the context of our common business relationship between you and STEVEN, we require the following categories of personal data from you:

- All necessary data for the establishment and execution of a business relationship;
- Data required to fulfill contractual obligations;
- Data that we are legally obliged to collect.

Without this data we are not able to conclude or fulfill contracts with you.

## 7. Deletion periods

In accordance with the applicable data protection regulations, we store your personal data no longer than required for the relevant purpose. If the data is no longer needed for the fulfillment of contractual or legal obligations, it will be deleted by us on a regular basis, unless its temporary storage is still necessary. This can be due to the following reasons:

- Commercial or tax law retention obligations must be observed: The periods of retention, primarily according to the regulations of the German Commercial Code and the German Fiscal Code, can be up to 10 years.
- To obtain evidence in the event of legal disputes within the scope of legal statute of limitations: Statute of limitations in civil law can be up to 30 years, with the regular statute of limitations occurring after three years.

## 8. Your rights

In the context of processing your personal data, you are also entitled to certain rights. More detailed information can be found in the corresponding provisions of the Basic Data Protection Regulation (articles 15 to 21).

### 8.1 Right to information and correction

You have the right to receive information from us about which of your personal data we process. If this information is not (or no longer) correct, you can demand that we correct the data, and if the information is incomplete, you can demand that it be supplemented. If we have passed on your data to third parties, we will inform the respective third parties if this is allowed by law.

### 8.2 Right to deletion

Under the following circumstances, you can request the immediate deletion of your personal data:

- If your personal data is no longer needed for the purposes for which it was collected;
- If you have revoked your consent and there is no other legal basis for data processing;
- If you object to the processing and there are no overriding legitimate reasons for data processing;
- If your data is processed unlawfully;
- If your personal data has to be deleted to fulfill legal obligations.

Please note that before deleting your data, we have to check if there is no legitimate reason to process your personal data.

### 8.3 Right to restrict processing ("right to block")

For one of the following reasons, you may request us to limit the processing of your personal data:

- If you dispute the accuracy of the data until we have had the opportunity to verify the accuracy of the data;
- If the data is processed unlawfully but instead of its deletion you only request the restriction of use of the personal data;
- If we no longer need the personal data for processing, but you still need it to assert, exercise or defend legal claims;
- If you have lodged an objection to the processing and it is not yet clear whether your legitimate interests outweigh ours.

### 8.4 Right of objection

#### 8.4.1 Right of objection in individual cases

If the processing is carried out in the public interest or on the basis of a balancing of interests, you have the right to object to the processing for reasons arising from your particular situation. In the event of an objection, we will not further process your personal data, unless we can prove compelling reasons for processing your data that are worthy of protection and outweigh your interests, rights and freedoms, or because your personal data serves to assert, exercise or defend legal claims. The objection does not affect the lawfulness of the processing that took place before the objection.

#### 8.4.2 Objection to advertising

In cases where your personal data is used for advertising purposes, you can object to this form of processing at any time. We will then no longer process your personal data for these purposes.

The objection can be informal and should be addressed to:

STEVEN Reeds GmbH  
Brookstraße 27  
48607 Ochtrup  
Germany  
Fax: +49 2553 2913  
info@steven.de

### **8.5 Right to data transferability**

On request, you have the right to receive personal data that you have given us for processing in a transferable and machine-readable format.

### **8.6 Right to appeal to the supervisory authority (Art. 77 DS-GVO)**

We always try to process your inquiries and claims as quickly as possible in order to protect your rights accordingly. However, depending on the frequency of the inquiries, it may take up to 30 days before we can inform you further about your request. If it takes longer, we will inform you promptly of the reasons for the delay and discuss the further procedure with you.

In some cases we are not allowed or not able to give you any information. If legally permissible, we will inform you of the reason for the refusal to provide information.

However, if you are not satisfied with our answers and reactions or if you believe that we are violating applicable data protection laws, you are free to lodge a complaint with both our data protection officer and the relevant supervisory authority. The supervisory authority responsible for us is:

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40213 Düsseldorf  
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